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16 IN THE UNITED STATES DISTRICT COURT
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18 EASTERN DISTRICT OF CALIFORNIA

19 UNITED STATES OF AMERICA,
20 Plaintiff,
21 v.
22 JESUS LOUIS VASQUEZ,
23 Defendant.

24 CASE NO. 2:23-cr-00095-JAM-1

25 **STIPULATION AND ORDER TO CONTINUE
26 FURTHER STATUS CONFERENCE AND
27 EXCLUDE TIME UNDER SPEEDY TRIAL ACT**

28 DATE: January 21, 2025
TIME: 9:00 a.m.
COURT: Hon. John A. Mendez

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30 **STIPULATION**

31 Plaintiff United States of America, by and through its counsel of record, Special Assistant United
32 States Attorney Caily Nelson, and defendant, by and through defendant's counsel of record, Mark J.
33 Reichel, hereby stipulate as follows:

34 1. By stipulation, the government and Jesus Vasquez, through counsel, Jennifer Mouzis,
35 moved to continue the status conference until January 23, 2025, with an exclusion of time, under Local
36 Code T4.

37 2. By previous order, this matter was advanced for status on January 21, 2025.

38 3. By previous order, Mark J. Reichel was appointed as counsel for Jesus Vasquez in place
39 of Jennifer Mouzis on December 20, 2024.

40 4. By this stipulation, defendant now moves to continue the status conference until April 8,
41 2025, at 9:00 a.m. and to exclude time between January 21, 2025, and April 8, 2025, under Local Code

1 T4.

2 5. The parties agree and stipulate, and request that the Court find the following:

3 a) The discovery associated with this case includes over one hundred pages of
4 reports, photos, and search warrant documents, as well as cellular phone downloads. All of this
5 discovery has been either produced directly to counsel and/or made available for inspection and
6 copying.

7 b) Counsel for defendant desires additional time to review the discovery with his
8 client, research and investigate possible defenses, discuss any potential resolution with his client,
9 research mitigating evidence, and present it to the prosecution. Mr. Reichel was recently
10 appointed to this matter on December 20, 2024.

11 c) Counsel for defendant believes that failure to grant the above-requested
12 continuance would deny him/her the reasonable time necessary for effective preparation, taking
13 into account the exercise of due diligence.

14 d) The government does not object to the continuance.

15 e) Based on the above-stated findings, the ends of justice served by continuing the
16 case as requested outweigh the interest of the public and the defendant in a trial within the
17 original date prescribed by the Speedy Trial Act.

18 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
19 et seq., within which trial must commence, the time period of January 21, 2025 to April 8, 2025,
20 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
21 because it results from a continuance granted by the Court at defendant's request on the basis of
22 the Court's finding that the ends of justice served by taking such action outweigh the best interest
23 of the public and the defendant in a speedy trial.

24 6. Nothing in this stipulation and order shall preclude a finding that other provisions of the
25 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
26 must commence.

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2 Dated: January 14, 2025

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4 MICHELE BECKWITH
5 Acting United States Attorney

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8 /s/ CAILY NELSON
9 CAILY NELSON
10 Special Assistant United States
11 Attorney

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13 Dated: January 14, 2025

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15 /s/ MARK J. REICHEL
16 MARK J. REICHEL
17 Counsel for Defendant
18 Jesus Louis Vasquez

FINDINGS AND ORDER

2 The Court, having received, read, and considered the parties' stipulation, and good cause
3 appearing therefrom, adopts the parties' stipulation in its entirety as its order. The Court **VACATES** the
4 January 21, 2025, **further status conference** and **RESETS** the matter for **April 08, 2025, at 9:00 a.m.**
5 The Court also specifically finds that based on the facts set forth in the parties' stipulation, the failure to
6 exclude the time between January 21, 2025, and April 8, 2025, would deny counsel reasonable time
7 necessary for effective preparation, taking into account the exercise of due diligence. The Court further
8 finds that the ends of justice served by the continuance outweigh the best interests of the public and the
9 defendant in a speedy trial. Time from January 21, 2025, to and including April 8, 2025, is excluded
10 from the computation of time within which the trial of this case must commence under the Speedy Trial
11 Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), and Local Code T-4. With this stipulation, 0 of
12 70 days have been used against the computation of time within which a trial must commence.

IT IS SO ORDERED.

Dated: January 15, 2025

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE